MAZZOLA LINDSTROM LLP

Shan (Jessica) Chen Counsel for plaintiffs 1350 Avenue of the Americas, 2nd Floor New York, New York 10019 (d) 646-416-6280 (m) 347-652-9046 jessica@mazzolalindstrom.com

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

-----X

KEVIN BEASLEY and KEVIN BEASLEY STUDIO, LLC,

Plaintiffs,

Civil Action No.: 3:24-cv-09172-MAS-RLS

-against-

**Request For Entry of Default** 

Michael Fanelli,

Defendant.

-----X

To: Clerk, United States District Court for the District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Room 2020
Trenton, NJ 08608

Pursuant to Fed. R. Civ. P. 55(a), please enter a default against defendant Michael Fanelli for failure to answer or otherwise defend this action. In support of the same, please see the certification of Shan Chen, which is attached to this request for entry of default.

Dated: New York, New York December 9, 2024

Respectfully submitted,

MAZZOLA LINDSTROM, LLP

Shan (Jessica) Chen

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Counsel for plaintiff

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## **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury pursuant to 28 U.S.C. §1746 that on the date indicated below, I caused Plaintiffs' Request for Entry of Clerk's Default, and supporting documents, to be served via First Class Mail/Postage Paid upon defendant Michael Fanelli as follows:

Michael Fanelli 1 Denise Ct. Manalapan, NJ, 07726

Dated: New York, New York December 9, 2024

MAZZOLA LINDSTROM, LLP

Shan (Jessica) Chen Counsel for plaintiff

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